



December 10, 2007



Mr. Remilando Pinga  
Air Quality Division  
MDEQ  
SE Michigan District Office  
27700 Donald Court  
Warren, MI 48092

RE: Process Changes for EGSCREENING Emission Unit

Dear Mr. Pinga:

This letter serves as notification as required by Rule 215 (R 336.1215) and NSPS Subpart 000 for the upcoming modifications to EGSCREENING emission unit.

In a previous letter sent to you on August 3, 2007, Cargill gave an initial notification of the proposed changes. As part of Cargill's continuing efforts to improve efficiency and reliability of all operations at our St. Clair facility, we plan to begin construction on the changes to the EGSCREENING emission unit. Emissions from EGSCREENING will continue to be controlled by the same fourth/fifth floor wet scrubber, and we will continue to meet the NSPS particulate emission limits. These changes will not increase production capacity.

The following changes will be made:

1. An existing coffin screener, which is currently attached to EGSCREENING, will be replaced with a new screener.
2. A new Fine Flake elevator, a sealed Fine Flake conveyor and Fine Flake metering screw will be added
3. A sealed fines metering screw and fines blending spouting will be added.
4. A mill feed screw, mill feed surge hopper, flaking mill, and sealed transfer conveyor will be added.
5. A new sealed screw conveyor, Rotex screener, and granulator will be added.
6. Existing return spouting to an existing elevator will be replaced with new spouting.

The dust pickup points from this screening operation will attach to the EGSCREENING fourth/fifth floor scrubber.

We believe that these changes do not require a Rule 201 permit, based on the exemption provided in Rule 285(c). Changes to this process do not involve installing, constructing or reconstructing an emission unit and do not involve any meaningful change in quality or increase in emissions.

Arrival and installation of this equipment is expected to begin late December 2007 and completion is anticipated to be in June of 2008.

Should you have any questions concerning this project, please contact me at (810) 989-7544.

Sincerely,

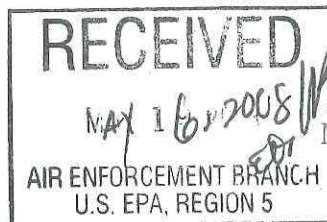


Sheri Ofiara  
EHS Coordinator

Cc:

**US EPA**

Air Compliance Data – Michigan  
Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, IL 60604



May 13, 2008

**COPY**

Mr. Remilando Pinga  
Air Quality Division  
MDEQ  
SE Michigan District Office  
27700 Donald Court  
Warren, MI 48092

RE: Process Changes for EGSCREENING Emission Unit

Dear Mr. Pinga:

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In a previous letter sent to you on December 10, 2007, Cargill gave a notification of the proposed changes. As part of Cargill's continuing efforts to improve efficiency and reliability of all operations at our St. Clair facility, construction on the changes to the EGSCREENING emission unit has begun. Emissions from EGSCREENING will continue to be controlled by the same fourth/fifth floor wet scrubber, and we will continue to meet the NSPS particulate emission limits. These changes will not increase production capacity.

In our previous notification letter to you, Cargill indicated that the following changes would be made:

1. An existing coffin screener, which is currently attached to EGSCREENING, will be replaced with a new screener. (Update: This change was made on May 3, 2008 and is now in service.)
2. A new Fine Flake elevator, a sealed Fine Flake conveyor and Fine Flake metering screw will be added. (Update: The existing Fine Flake elevator and Fine Flake conveyor have been replaced on April 12, 2008 and is now in use. The sealed Fine Flake metering screw has yet to be installed.)
3. A sealed fines metering screw and fines blending spouting will be added (Future work).
4. A mill feed screw, mill feed surge hopper, flaking mill, and sealed transfer conveyor will be added (Future work).
5. A new sealed screw conveyor, Rotex screener, and granulator will be added (Future work).

6. Existing return spouting to an existing elevator will be replaced with new spouting (Installed and put into service on May 3, 2008).

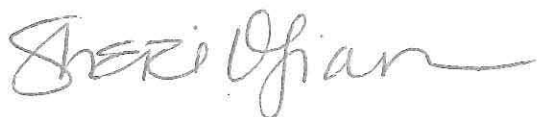
The dust pickup points from this screening operation will attach to the EGSCREENING fourth/fifth floor scrubber.

We believe that these changes do not require a Rule 201 permit, based on the exemption provided in Rule 285(c). Changes to this process do not involve installing, constructing or reconstructing an emission unit and do not involve any meaningful change in quality or increase in emissions.

Cargill will continue to keep the State and EPA abreast of changes as new and replacement equipment go into service. As indicated in the previous letter, the completion of this project is still anticipated to be in June of 2008.

Should you have any questions concerning this project, please contact me at (810) 989-7544.

Sincerely,



Sheri Ofiara  
EHS Coordinator

Cc:

**US EPA**

Air Compliance Data – Michigan  
Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, IL 60604





July 23, 2008



**COPY**

Mr. Remilando Pinga  
Air Quality Division  
MDEQ  
SE Michigan District Office  
27700 Donald Court  
Warren, MI 48092

RE: Process Changes for EGSCREENING Emission Unit

Dear Mr. Pinga:

This letter serves as notification as required by Rule 215 (R 336.1215) and NSPS Subpart 000 for the upcoming modifications to EGSCREENING emission unit.

In an initial letter sent to you on December 10, 2007, Cargill gave a notification of the proposed changes. A project update letter was also sent on May 13, 2008. As part of Cargill's continuing efforts to improve efficiency and reliability of all operations at our St. Clair facility, construction on the changes to the EGSCREENING emission unit has begun. Emissions from EGSCREENING will continue to be controlled by the same fourth/fifth floor wet scrubber, and we will continue to meet the NSPS particulate emission limits. These changes will not increase production capacity.

In our previous notification letter to you, Cargill indicated that the following changes would be made:

1. An existing coffin screener, which is currently attached to EGSCREENING, will be replaced with a new screener. This change was made on May 3, 2008 and is now in service.
2. A new Fine Flake elevator, a sealed Fine Flake conveyor and Fine Flake screw will be added. The existing Fine Flake elevator and Fine Flake conveyor have been replaced on April 12, 2008 and is now in use. (Update: The sealed Fine Flake screw was put into service July 14, 2008.)
3. A sealed fines screw and fines blending spouting will be added. (Update: These were put into service July 14, 2008.)

4. A mill feed screw, mill feed surge hopper, mill, and sealed transfer conveyor will be added. (Update: These are installed and were put into service on July 14, 2008).
5. A new screener and granulator will be added. (Update: These have been installed and were put into service on July 14, 2008.)
6. Existing return spouting to an existing elevator will be replaced with new spouting. This was installed and put into service on May 3, 2008.

The dust pickup points from this screening operation will attach to the EGSCREENING fourth/fifth floor scrubber.

We believe that these changes do not require a Rule 201 permit, based on the exemption provided in Rule 285(c). Changes to this process do not involve installing, constructing or reconstructing an emission unit and do not involve any meaningful change in quality or increase in emissions.

Cargill will continue to keep the State and EPA abreast of changes as new and replacement equipment go into service. The completion of this project is anticipated to be in August of 2008.

Should you have any questions concerning this project, please contact me at (810) 989-7544.

Sincerely,



Sheri Ofiara  
EHS Coordinator

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